

Why do we provide you with this information? We provide this information because we want you to clearly understand HealthCapable policies, practices, and procedures for using, securing, and protecting the personal information in your PHR. The table below provides you a snapshot. Scroll through the entire document to get a more detailed view of our policies.

Who can view your personal information?	Credentials Required
You	Account Number and PIN
Family and friends	<ul style="list-style-type: none"> Account Number and PIN Source of updated information will be listed as "Patient"
Healthcare providers without National Medical Network Credentials	<ul style="list-style-type: none"> Account Number and PIN Source of updated information will be listed as "Patient"
Healthcare providers with National Medical Network Credentials	NMN membership credentials AND <ul style="list-style-type: none"> your account number, or member search (at your option, this may require your PIN)
Insurers	NOT ALLOWED
Employers	NOT ALLOWED
Pharmacies	NOT ALLOWED
National Medical Network personnel	YES, as required for administrative purposes
Others	NO, but you should understand that our security model, adapted from the financial industry, is designed to prevent others from access to your Personal Health Information. The model requires that your account number and PIN remain under your control. If others gain access to your account number and PIN, your information will be at risk.
What can we use your personal information for?	
For National Medical Network's quality control requirements	YES
For marketing	NO
For medical research	YES
For selling to others	NO
For legal reasons	YES with valid court order
For legally authorized Public Health Authorities	YES
What are our policies about closing your PHR?	
Can you close your PHR?	YES
Can you transfer your PHR?	YES, prior to closing your account.

What is personal information?

You store personal information in your PHR as a way to help better manage your health. Personal information is information about you that includes contact information, demographic information, health information, and financial information. Examples are listed below:

Contact Information (e.g., for use in the event of an emergency or to speed up registering with a new physician)

- Name
- address
- email address
- Phone number
- Social security number
- Emergency contact

Demographic Information (e.g., to inform your physician of potential risk factors)

- Age
- Gender
- Ethnicity
- Occupation

Health Information (e.g., to better manage a health condition)

- Medical conditions
- Medications (over-the-counter and prescription)
- Lab/test results
- Doctor's contact information
- Immunizations
- Disease management charts
- Injury management

Financial Information (e.g., to keep track of your health care expenses)

- Healthcare bills
- Health insurance
 - Healthcare savings account (HSA) information

What PHR type are we?

The National Medical Network is a health information exchange solution that allows you to store and retrieve your personal health information in a manner that benefits you. Knowing the PHR type we provide will help you understand our policies, practices, and procedures.

The National Medical Network is created by **Independent** providers of your Personal Health Record. This table provides an overview of the various PHR providers.

PHR provided by	Description
Employer	Some large employers offer PHRs as a feature of a benefits plan.
Healthcare Provider	Some healthcare providers offer PHRs as a way to provide patients with health information from the clinicians' record.
Health Insurer (PPO or HMO)	Some health insurers offer PHRs to provide consumers with information from health insurance claims.
Independent	Some independent internet companies offer PHRs directly to consumers. Some Employers, Healthcare Providers, and Health Insurers may also have partnerships with independent internet PHR companies.

Who can view your personal information?

When you set up your PHR, you may be able to give permission to certain people or groups to view some or all of your personal information.

	Can they view information?	Can they add information?	Can they edit information?
You (PHR customer)	YES	YES	YES
Your family and friends	YES, if given your account credentials	YES, if given your account credentials	YES, if given your account credentials
Your healthcare providers who have valid credentials with the National Medical Network	YES, when they provide your account number, or perform a member search (at your option, this may require your PIN)	YES, when they provide your account number, or perform a member search (at your option, this may require your PIN)	YES, when they provide your account number, or perform a member search (at your option, this may require your PIN)
Your healthcare providers who do not have valid credentials with the National Medical Network	YES, if given your account credentials (only account number is required for emergency access)	YES, if given your account credentials. Source of updated information will be listed as "Patient"	YES, if given your account credentials. Source of updated information will be listed as "Patient"
Your health insurer	NO	NO	NO
Your employer	NO	NO	NO
Your pharmacy	NO	NO	NO
The National Medical Network and its employees	YES <ul style="list-style-type: none"> • for administrative purposes only • subject to privacy policy and Terms of Use 	NO	NO

	Can they view information?	Can they add information?	Can they edit information?
Companies doing work for The National Medical Network to operate and manage the systems	YES <ul style="list-style-type: none"> • for administrative purposes only • subject to privacy policy and Terms of Use 	NO	NO
The National Medical Network's business and advertising partners	NO	NO	NO
Law enforcement for legal investigations	YES, with valid court order	NO	NO
Government for national security	YES, with valid court order	NO	NO
The public (through chat rooms and forums)	NO	NO	NO

How may we use your personal information?

Common uses of personal information in a PHR	Does The National Medical Network do this?	Can you opt out?
For you and your health needs	YES	YES
Process exchanges between your PHR and healthcare providers	YES	YES
Process exchanges between your PHR and labs, pharmacists, health plans, etc.	YES	YES
The National Medical Network's everyday business practices	NO	YES
Communicate with you	YES	YES
Maintain and improve The National Medical Network's PHR systems	YES	YES
Manage The National Medical Network's security systems (such as against spam, misuse, and criminal activity)	YES	NO
The National Medical Network's marketing purposes – to offer our health-related products and services to you	YES	NO

Common uses of personal information in a PHR (continued)	Does The National Medical Network do this?	Can you opt out?
The National Medical Network's marketing purposes – to offer our non-health-related products and services to you	NO	NO
Sharing and selling for marketing: Your personal information to our business and advertising partners	NO	NO
Sharing and selling for marketing: Anonymized information to our business and advertising partners	NO	NO
Sharing and selling for marketing: Anonymized information for The National Medical Network to market itself to business partners	YES	NO
Sharing and selling for medical research	YES	NO
Your <u>personal information</u> for medical and public health research	YES	NO
<u>Anonymized information</u> for medical and public health research	YES	NO
For legal reasons, comply with subpoenas, court orders, and search warrants	YES	YES

What are our policies about closing your PHR?

The National Medical Network has specific policies if you close your PHR.

Common closing questions	Your options
Can you close your PHR?	YES
Is your personal information permanently removed from The National Medical Network's systems?	YES, after a one year grace period.
How long does The National Medical Network keep your personal information?	One year after subscription expiration (not guaranteed)
Will all authorized users' access be immediately terminated?	NO
Can you transfer your PHR data to another PHR?	YES, prior to closing PHR

Reasons you may be Notified	Will The National Medical Network Notify you?	Can you opt out?	Your options once Notified
Changes to The National Medical Network's policies, practices, and procedures	YES, on web site or via email	NO	Maintain or close account
If The National Medical Network is sold, merges with another company, or goes out of business.	YES, on web site or via email	NO	Maintain or close account
In the event of a security breach	YES, on web site or via email	NO	Maintain or close account
Changes to PHR services, such as new features	YES, on web site or via email	NO	Maintain or close account
Changes to the type of information available to or through your PHR	YES, on web site or via email	NO	Maintain or close account
Newsletters and optional surveys	YES	NO	Maintain or close account
Marketing materials from The National Medical Network and associates	YES	NO	Maintain or close account

How do we store and protect your personal information?

The National Medical Network uses physical, technical, and procedural safeguards to protect your personal information from unauthorized access or use.

Common protections of online and health information	Does The National Medical Network do this?
Legal protections: subject to and remains compliant with all relevant laws and regulations.	YES
<i>HIPAA Privacy and Security Rules for health information</i>	YES
<u>Computer network and data processing protections</u>	YES
Log of all PHR views (audit trail)	YES
<u>All data processed in USA</u>	YES
<u>User ID and password</u>	YES
<u>Time-out your PHR access when your computer is idle</u>	YES
Data storage protections	YES
All data storage in USA	YES
Geographically diverse data storage locations	YES
Data storage power supply redundancy, environmental controls, and a security system	YES

Contact Information

Web: www.NationalMedicalNetwork.com

Email: info@healthcapable.com

Privacy Officer: Dr. Thomas Zhang

Write: 233 E. Erie, 2406, Chicago, IL 60611

Call: 800 893 3051